



Notice of Funding Availability for HUD's FY 2013 Comprehensive Housing Counseling Grant Program

Frequently Asked Questions – 3/8/13

ELIGIBILITY AND DECIDING HOW TO APPLY

- 1) Question: Should the agency's independent audit be submitted to its Point of Contact (POC) prior to the grant submission, or should the current independent audit be submitted as an attachment in the grant submission?**

Answer: The most recent audit of financial activities must be submitted as an attachment in the application submission. More detailed instructions regarding "External Audits and Investigations" are included on pages 7 and 13 of the NOFA."

- 2) Question: In the Detailed Budget Form (HUD-424-CB), how should Applicants fill out the Column 1 (HUD Share \$)? Should we leave it blank? Include FY12 dollar figures?**

Answer: Applicants are not required to submit the HUD-424-CB as part of the NOFA Application. See NOFA pages 13 – 14 under "Application Checklist" for a list of forms, information, certifications and assurances that apply to this NOFA.

- 3) Question: With only \$19.5 million of grant funding available, we are trying to determine if the grant award sizes will be too low to merit our applying. Can you please provide further guidance?**

Answer: All additional funding is subject to Congressional appropriation; however HUD does anticipate that additional Housing Counseling Program grant funds will become available. It is important to note that there will be only one application for all Housing Counseling grant funds for FY2013. Thus, to be eligible for any grant funds, including the \$19.5 million currently available and any subsequently appropriated grant funds should they be appropriated, you must submit an application for the FY2013 NOFA.

- 4) Question: I represent an agency in a small, rural state – if this application becomes mostly numerical, I fear we don't stand a chance. Our whole state has fewer people than a few city blocks in New York or Chicago and is not racially diverse. Is HUD truly interested in serving clients in rural states, or just in large community revitalization projects in urban, multi-cultural environments? And how can a small agency compete with a larger one regarding capacity? We**

have one housing counselor that provides critical service, but our numbers will never be huge, our focus is necessarily limited to local needs and we cannot afford to leverage other positions.

Answer: Although HUD has streamlined the NOFA to require more quantitative and non-narrative responses, HUD does not intend to evaluate Applicants solely on numbers but rather on the overall quality of their housing counseling programs. HUD recognizes the important role that local housing counseling agencies play in their communities, regardless of whether that community is urban or rural. In fact, this year's NOFA places emphasis on agencies serving rural areas and areas lacking Internet access, as well as on geographically isolated agencies.

This NOFA encourages Local Housing Counseling Agencies to affiliate with HUD-approved Intermediaries and SHFAs because HUD understands that many local housing counseling agencies, along with the households they serve, benefit from association with larger networks led by strong national, regional or state organizations. This NOFA also includes incentives to promote affiliation with Intermediaries and State Housing Finance Agencies (SHFA). See Section I.C.1 "Encouraging Counseling Networks."

- 5) Question: Will HUD put a hold on agencies opening new branches between now and the March 18th NOFA deadline? Given that language in the NOFA promotes the number of branches, several agencies outside of our network have inquired whether they can expand their agency and open small satellite branches to be included in the branch.**

Answer: HUD has not put a hold on agencies opening new branches prior to the NOFA deadline. However, branches of LHCAs and branches of sub-grantees do not receive a base award under the funding methodology published in the NOFA.

- 6) Question: Can you please provide clarification for page 28 a Base Award? We are a LHCA with 1 main office and 2 satellite offices. There are counselors at each location. Would these be considered "branches" and are they listed separately on the application? Would each location be funded with a base award? I am having trouble figuring how our base award is calculated.**

Answer: A LHCA will receive a single base award regardless of the number of branches included in the application. However, all Applicants proposing to fund sub-grantees or branches under this NOFA must fill out the charts with information on both the Applicant itself and proposed sub-grantees and branches.

- 7) Question: Do you have to change your existing counseling plan prior to submitting the NOFA if you plan to have branches in another local or forming partnership?**

Answer: If an Applicant plans to add (but has not yet added) branches or affiliates, the NOFA does not require Applicants to update their housing counseling work plans prior to submitting the application. However, the HUD Housing Counseling Handbook does require participating agencies to submit work plan changes to HUD for approval prior to implementing such changes.

- 8) Question: I have registered with SAM (System for Award Management) and have a password and user name. I have my DUNS number. Now do I need another password and user name for Grants.gov?**

Answer: Yes, registration for Grants.gov is a multi-step process. The registration process can take approximately **2 to 4 weeks or longer** to complete, if there are data issues that need to be resolved.

Applicants must complete all of the following five sequential steps to register for electronic application submission through Grants.gov. Applicants that do not have a valid registration will not be able to submit an application through Grants.gov.

1. Step One: The Applicant organization checks with Dun and Bradstreet to see if they have an existing DUNS number. If no number is on file at Dun and Bradstreet for the organization, at its Street location, then the Applicant organization must obtain a DUNS number;
2. Step Two: Register the Applicant organization with SAM.gov;
3. Step Three: Register a user name and password (Authorized Organization Representative (AOR) ID at Grants.gov;
4. Step Four: The Applicant organization's E-Business Point of Contact (E-Biz POC) logs in to Grants.gov to grant authority to the Authorized Organization Representative (AOR); and
5. Step Five: The AOR confirms his or her status as —authorized Applicant|| to submit an application on behalf of the organization.

All five steps must be completed to have a valid registration and to be able to successfully submit an application via Grants.gov.

Further information regarding Registration can be obtained from the Grants.gov —Get Registered website at: http://www.grants.gov/applicants/get_registered.jsp and Appendix C.

See Section III of the General Section for more information at:
<http://portal.hud.gov/hudportal/documents/huddoc?id=2013nofagensec.pdf>

In addition, visit the FAQs on: www.SAM.gov

Grants.gov has posted instructions in Frequently Asked Questions at:
http://grants.gov/applicants/applicant_faqs.jsp

Applicants should review these FAQs, as they will assist them in making sure they are properly set up to successfully submit an application. Applicants need to make sure that the default setting on their Adobe Reader is set to the new version of Adobe Reader software downloaded from www.Grants.gov. Applicants that need assistance can contact the Grants.gov Contact Center by phone; toll free, at 800-518-GRANTS or via email at support@grants.gov. Document all communications with grants.gov assistance and maintain that documentation.

- 9) **Question: Our Intermediary organization added an additional question to our internal sub-grantee application requesting the date of LHCAs' HUD approval. This lets us be more sure that they have responded accurately. We've heard from some sub-grantees that they do not know the date of their HUD approval and that although they've contacted numerous HUD offices asking for the information, none has been able to provide it. Can you tell us if this information can be confirmed by a particular HUD office or staff person, or if it's found in the Housing Counseling System (HCS)?**

Answer: Unfortunately, in many cases the date an LHCA was originally approved by HUD is not readily available in HUD's records. However, there are alternative methods a parent agency could

use to verify whether or not its sub-grantees are HUD-approved LHCA's. For example, the most straightforward method may be for the parent agency to request from the agency a copy of the agency's Certificate of Approval, which will show the period for which the LHCA is currently approved. Alternatively, the parent could request a copy of the agency's latest performance review report or a copy of the agency's approval letter if the agency was approved in the past two years and therefore cannot provide documentation of a performance review.

- 10) Question: Our agency is trying to find the exact date our certification as a HUD Local Housing Counseling Agency (LHCA). We have tried several HUD offices and web sites with no success. Do you have access to this information in a data base or file?**

Answer: HUD-approved LHCA's will have a Certificate of Approval that shows the time period for which the LHCA is currently approved. However, in many cases the date an LHCA was originally approved by HUD is not readily available in HUD's records. To get the date the LHCA was originally approved by HUD, the LHCA should contact their designated Point of Contact in HUD's Office of Housing Counseling to determine if that information is available.

- 11) Question: Our organization provides rental housing counseling, however the counselors do not prepare budget/financial analysis or formal action plans for these particular counseling sessions. The clients who require this type of counseling are not commonly interested in a budget/financial analysis due to the nature of their immediate reason for calling which is usually related to eviction, maintenance issues, fair housing, lease questions, etc., however, we do inform the clients that we can provide budget/financial counseling upon their request. Does this mean that we can no longer bill the HUD grant for Rental (Tenant-Landlord) Counseling services?**

Answer: To be eligible for reimbursement under this NOFA, counseling must include budget/financial analysis, housing analysis, action plan, discussion of alternatives, and follow-up as described in NOFA Section III.C.1. These components are required of all counseling services per HUD's Housing Counseling Handbook (see Chapter 3, ¶ 3-5).

- 12) Question: Please clarify what HUD expects from housing counseling agencies regarding the "Discuss Alternatives" section on page 8 of the NOFA.**

Answer: Counselors must not advise clients, or promote specific products, features or programs. Their role is to simply make counseling recipients aware of their options and empower them with the information they need to help them make smart choices. Therefore, counselors must identify and discuss with the client at least three alternatives or options available to the client relevant to the specific housing need. Ideally, the counselor would first discuss a few options the client can use to deal with their debt (e.g., paying on their own, calling creditors to work out special payment plan arrangements, considering a debt management plan). However, if the counselor tells the client that their own agency is a debt management plan provider, then the counselor also needs to tell the client about alternative debt management plan providers. A counseling session should not be used to steer clients into an agency's debt management plan, so if your own debt management plan is offered as an option the client needs to be made aware of alternatives.

COMPLETING THE APPLICATION

- 1) Question: How should we provide the Organization Description as stated on page 14 of the NOFA?**

Answer: The Organization Description should be attached to the Applicant's grant application as a separate document. We prefer that the description be in Word format.

- 2) Question: In this year's NOFA, counselor capacity and training experience have been omitted. How does HUD plan to track counselors' experience and training this year?**

Answer: In an effort to streamline the Housing Counseling Program NOFA, HUD has reduced the level of detail required for counselors who will provide counseling services under the grant. Instead of requiring counselor-level detail regarding capacity, this year's NOFA instead requires agency-level information regarding training, testing and certification (see NOFA page 17 under "Capacity"). Participating agencies must continue to meet HUD program requirements regarding counselor experience and training (see HUD Handbook 7610). HUD will continue to monitor participating agencies' compliance with these program requirements through performance reviews.

- 3) Question: Should LHCA's complete the HUD 9906 Housing Counseling charts as the Applicant only, or as Applicant and branch areas?**

Answer: All Applicants proposing to fund sub-grantees or branches under this NOFA must fill out the charts with information on both the Applicant itself and proposed sub-grantees and branches.

- 4) Question: Besides the Consolidated Plan, what other sources of information can we use for determining impediments to fair housing?**

Answer: Applicants may use any information source that documents impediments to fair housing choice, such as discriminatory housing practices under the Fair Housing Act, in the Applicant's jurisdiction.

- 5) Question: We opened a branch office in October 2012. In all the charts, when we enter the information about the branch office do we answer as we project for the future anticipated activities?**

Answer: You should enter information using the time period requested in the NOFA. For example, on page 18 of the NOFA under "Measuring Client Satisfaction," the NOFA requires Applicants to "Use Chart A ... to indicate if the Applicant itself, and proposed sub-grantees and/or funded branches, if applicable, measured customer satisfaction during the period October 1, 2011 through

September 30, 2012.” For the newly opened branch, you would not put an “X” in any of the columns for this section because the branch was not open during the given timeframe and therefore does not meet the given criteria. However, in other instances the NOFA does request Applicants to provide information on projected future activities (e.g. pg. 23 “Projected Performance – Work Plan.” In these cases, you would provide information on projected activities for the newly opened branch.

6) Question: In the Detailed Budget Form (HUD-424-CB), how should Applicants fill out the Column 1 (HUD Share \$)? Should we leave it blank? Include FY12 dollar figures?

Answer: Applicants are not required to submit the HUD-424-CB as part of the NOFA Application. See NOFA pages 13 – 14 under “Application Checklist” for a list of forms, information, certifications and assurances that apply to this NOFA.

7) Question: Last year, we embedded Excel charts into Word documents to create one coherent narrative addressing each of the Rating Factors and Sub-factors. I noticed that we are not able to “copy and paste” the template into a Word document this year. Is it necessary to embed the Excel information into a consolidated Word document for each Rating Factor? And if a narrative is required, is this just considered an “attachment”?

Answer: The Excel chart should be completed, saved and submitted as an Excel document. The narratives should be created and saved as Word documents in the appropriate format and submitted as attachments.

For more information on format requirements please refer to HUD’s Fiscal Year (FY) 2013 Notice of Funding Availability (NOFA) Policy Requirements and General Section to HUD’s FY2013 NOFAs for Discretionary Programs, page 27, which states the following:

Forms in the Instructions Download. HUD —program-specific forms not available in the Application download will be available in the Instructions download. These forms are accessible via Microsoft Word Office 2003 (.doc), Microsoft Excel Office 2003 (.xls), or Adobe (.pdf) format, compatible with Adobe Reader 9.4. The PDF forms are fillable but not savable, unless you have Adobe Professional 8.0 or higher. Applicants may use the HUD96011, —Third Party Documentation Facsimile Transmittal (“HUD Facsimile Transmittal” on Grants.gov) form and fax to HUD any forms they have completed but cannot save.

Page 28 states the following:

Narrative Statements to the Factors for Award. If you are required to submit narrative statements, you must submit them as an electronic file in Microsoft Word Office 2007 (or earlier) (.doc), Microsoft Excel 2007 (or earlier) (.xls), or in Adobe (.pdf) format that is compatible with Adobe Reader 9.4, 10.0.1, or the latest version available from Grants.gov. **If HUD receives a file in a format or software other than those specified or that is not compatible**

8) Question: What defines a “housing counseling related network/collaborative” as listed in Chart A? Can you give an example?

Answer: This refers to local, regional or state housing counseling related networks/collaboratives. For example, in the Washington, DC area, the Capital Area Foreclosure Network supports organizations that help homeowners at risk of foreclosure. Agencies participating in this or other

housing counseling related networks/collaboratives would list the name of the network/collaborative in Chart A.

- 9) Question: Rating Factor 1, Sub factor 1 indicates the use of chart A, however can we still submit a narrative?**

Answer: Please refer to page 16 of the NOFA. The table on page 16 identifies when the Applicant must provide the narrative on a Chart, and when a separate narrative is required. The table on page 16 instructs the Applicant to use Chart A for Rating Factor 1, Sub-factor 1, so the Applicant must only provide narrative on the Chart for this Sub-factor. The right-hand column, Separate Narrative, on page 16 identifies when the NOFA requires a separate narrative that is not on a chart.

- 10) Question: Regarding HUD 9906 Chart: Chart A, Column X “Name(s) of Housing Counseling Related Networks/Collaboratives, if Applicable”: Our sub-grantees have many collaboratives, from statewide associations, local workgroups, taskforce. Does HUD want us to list all of these networks since there is limited space to include this information?**

Answer: Yes. You should list all housing counseling related networks in which the Applicant and each sub-grantee and branch participates. Applicants can enter all of this information in the chart, and even if all of the information does not display in the cell, it will still be captured in Excel. Applicants can confirm this by selecting the cell and looking at the formula bar, which will show all information included in the cell.

- 11) Question: Regarding HUD 9906 Chart: Chart A, Column AG “Pulled Credit Reports 6 or More Months”: Our sub-grantees pull credit reports depending on the service provided. The service that is received usually sets the standard for when a credit report is pulled. Can HUD provide additional guidance on how to answer this question?**

Answer: Applicants should put an “X” in Chart A, Column AG to indicate which agencies, if any, pull credit reports 6 months or more after counseling was completed as a way of evaluating program success. If the agency does not do this, regardless of the reason for choosing not to do so, then Applicants should not place an “X” in Chart A, Column AG for that agency.

- 12) Question: HUD 9906- Chart A: Please clarify how we, as a SHFA, should complete the Applicant row. Should we provide the information as a SHFA that is not providing a direct service or should we take into consideration what we require of our sub-grantees.**

Answer: You should fill out Chart A with the information applicable to the row you are completing. So, for example, in the Applicant row, you would not put an “X” in Column L if you as the Applicant (the SHFA) do not provide counseling services in multiple languages. But if your sub-grantees do provide counseling services in multiple languages, then you would put an “X” in each applicable sub-grantee row.

- 13) Question: Our Intermediary would like to position itself to grow our network of HECM counselors. However, expansion opportunity will depend on the grant award amount, and therefore we have a question on how to complete Chart A. In Chart A, Column B, we’ve listed our existing sub-grantee agencies and a variety of pertinent information on each one. Must we also list here potential new sub-grantees by name and collect all this data from agencies with**

which we do not yet have a relationship? We prefer to approach new partnerships thoughtfully and carefully and would prefer to include our intentions to grow within the narrative. Is this acceptable? What is expected?

Answer: Intermediaries must fill out Chart A with the required information for all sub-grantees included in the grant application. Intermediaries will only receive a base award for sub-grantees whose information is included in Chart A.

14) Question: We operate HUD funded programs that are not listed on Chart C “Other HUD Programs.” Is there a way to report those other housing services? For instance – we operate Continuum of Care homeless services and homeless prevention.

Answer: For purposes of this NOFA application, Applicants should only provide information on the programs that are specifically listed in Chart C.

15) Question: On Chart D - Leveraging, are phone numbers required for the point of contact at the organization providing leveraged funds? Are email addresses ok?

Answer: The NOFA does not specify what type of contact information Applicants must provide for each leveraged funding source. Therefore, Applicants may include phone number and/or email address for the point of contact at each organization providing the leveraged funds.

16) Question: Can Applicants include anticipated sources of leveraged funding in Chart D?

Answer: No, Applicants will be evaluated based on the additional non-federal resources they have already obtained. Grantees will be required to maintain evidence that leveraged funds were actually provided to the agency. Files may be reviewed by HUD staff as a part of the performance reviews and on-site monitoring visits.

17) Question: For Rating Factor 4 “Leveraging Resources”, should we provide the total grant award with dates, or the pro-rated award amount with dates?

Answer: Page 25 of the NOFA states that Applicants must provide an itemized list of all leveraged resources, including in-kind contributions, for the Applicant and each proposed sub-grantee and/or funded branch office. Chart D must include the name of each organization providing funds or in-kind contributions, type of contribution, time period funds are available, use of funds, and the amount of funds. There is no need for Applicants to pro-rate funds. Applicants must simply provide all information requested in Chart D.

18) Question: Our sub-grantees exceed the number of allotted spaces allowed on Chart A - Applicant Characteristics. We also have the same issue with Chart D - Leveraging. Will additional copies of the charts be provided, or will the copy feature be activated to allow additional copies of the charts to be added to the Excel workbook?

Answer: On Chart A, you may add rows for additional sub-grantees by completing the following steps:

1. Click on the row number of one of the sub-grantee rows. This will select the entire row.
2. Right click on the row number of the row you just highlighted.
3. Click “Insert.” A new row will be added to the sub-grantee section of the chart.

On Chart D, you may follow the same process above to add additional sub-grantee rows. However, unfortunately in Chart D there is no way to add rows for additional funding sources for the Applicant. Therefore, to record multiple funding sources for the Applicant, you should list the first source in the Applicant row and the additional funding sources in the rows labeled “Sub-grantees or Branches (if applicable).” In Column B, “Names of Applicant, Sub-grantees/Branch Offices Proposed to be Funded,” be sure to put the Applicant name so it is clear that the funding source is for the Applicant rather than a sub-grantee or branch.

19) Question: If we are an Intermediary that has approved branches but we do not fund branches individually, would we enter the total budget for our agency in Column B on Chart E – Budget and then enter zero in Column C? Otherwise, if I enter the same amount in both columns, the total noted in Column D would not reflect our Applicant budget correctly.

Answer: The NOFA requires Applicants to provide the total housing counseling budget of the Applicant separately from the total housing counseling budget of all sub-grantees and funded branches. Therefore, you must provide the total housing counseling budget of only the Applicant in Chart E, Column B and separately provide the total housing counseling budget of all sub-grantees and funded branches in Chart E, Column C.

20) Question: We are an SHFA that will be applying for this funding for the first time. What should we demonstrate to satisfy the past performance impact category? (Rating Factor 3, Sub-factor 1- HUD will utilize 9902 Form).

Answer: Agencies that did not electronically submit to HUD a form HUD9902 for the period October 1, 2011 through September 30, 2012 (e.g. an SHFA that did not participate in HUD’s Housing Counseling Program in FY12) must submit a HUD-9902 for the period October 1, 2011 – September 30, 2012 as part of their NOFA application (see “Application Checklist” on NOFA pages 13 – 14). This HUD-9902 report should reflect the total housing counseling activity of the Applicant and its network (if applicable) for FY 2012. See HUD Handbook 7610 for additional guidance on completing the HUD-9902 report.

21) Question: We are an SHFA that will be applying for this funding for the first time. How can we complete Chart E for the period 10/1/11 – 9/30/12? (Rating Factor 3 (1B))

Answer: Chart E should include the Applicant’s total housing counseling program budget for the period October 1, 2011 – September 30, 2012, including all sources of funding (not just HUD funding). This budget should reflect the budget used to operate your housing counseling program during FY2012, regardless of whether or not HUD funding was received during that year.

22) Question: For the required Transition or Succession Plan in Rating Factor 5 on page 27 of the NOFA, would it be appropriate to outline the plan within the narrative or are you requesting a separate document uploaded?

Answer: The NOFA does not specify whether the Transition or Succession Plan should be included within the narrative or uploaded as a separate document, so either method is acceptable.

23) Question: Does the 25-page limit for HUD grant application include the response to Bonus Points for Sustainable Communities and the 9906 Tables?

Answer: The 25-page limit applies only to the narrative responses to the rating factors, not the charts included in HUD-9906. There is no narrative response required for the Preferred Sustainable Communities Status bonus points.

24) Question: Mine is a statewide agency and has served every county in Wisconsin except five (of 72). If there are "preferred sustainable communities" in Wisconsin, any resident who is a qualified Applicant will be served by our agency. Do I need still need verification and if so, do I need to get the contact in every area of the state to certify our status on the HUD form?

Answer: To receive the Preferred Sustainable Communities Status bonus points, the Applicant is required to obtain a certification from the designated Point of Contact for each locality. The Applicant should have a separate Form HUD-2995 certified for each individual Sustainable Communities locality.

POST APPLICATION INFORMATION

1) Question: Based on current grant language would an agency be limited to fund activity based on the per branch funding amount or would they be able to redistribute the funds among their other branches or sub-grantees as they case may be?

Answer: Intermediaries, SHFAs and MSOs will receive a Base Award amount based on the number of proposed sub-grantees and funded branches included in their application. In addition, the parent organization may also receive additional funding to provide support to a network and a competitive funding amount – see “Funding Methodology” on pages 27 – 28 of the NOFA. This funding methodology will determine the total amount of funding to be provided to the parent organization. However, the parent organization will have discretion on how it sub-allocates grant funds to its sub-grantees and funded branches.

2) Question: Can suballocation % change from the NOFA to actual contract? Or do we have to stick to the % specified in Column W in Chart A?

Answer: Grantees will have the ability to modify sub-allocations with prior approval from HUD.

3) Question: How will the use of last year’s budget information impact (an organization receiving a modest award during FY 11-12) the current FY12-13 award?

Answer: The size of an organizations FY12 award will not directly impact its FY13 award. In scoring Rating Factor 3, Sub-factor 1.b Budget, HUD may evaluate expenses for direct

counseling service provision, the ratio of HUD grant funds to total budget and the cost per client. The budget information provided in Chart E must include all sources of funding for the agency's housing counseling program, not exclusively HUD grant funds.